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6 *Attorneys for Defendants*
7 Romeo Aranas, Beebe Clark, James Cox, James Dzurenda,
Leilani Flores, Jo Gentry and Dwight Neven

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 ELIZABETH CARLEY,

11 Plaintiff,

12 v.

13 WARDEN NEVEN, et al.,

14 Defendants.

Case No. 2:17-cv-02346-MMD-CLB

15 **STIPULATION FOR EXTENSION OF TIME**
TO FILE DISPOSITIVE MOTIONS
(Second Request)

16 Plaintiff, Elizabeth Carley, by and through counsel, Lisa A. Rasmussen, and Defendants, Romeo
17 Aranas, Beebe Clark, James Cox, James Dzurenda, Leilani Flores, Jo Gentry and Dwight Neven, by and
18 through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior
19 Deputy Attorney General, hereby stipulate to extend the deadline to file dispositive motions to January
20 18, 2022. The Court, in ECF 45, established that dispositive motions were to be filed by October 31,
21 2021. October 31, 2021 was a Sunday. A previous extension was granted by this Court. ECF No.75.

22 Counsel for the Defendants has had an extremely busy November. Counsel was involved, in
addition to his usual practice, with an evidentiary hearing in Las Vegas in the death penalty case of Zane
23 Floyd v NDOC. Counsel has also completed dispositive motions in 3 other cases and is preparing for a
24 jury trial in December. Therefore, the dispositive motion, in this matter, has not been completed. With
25 the holidays approaching, Counsel for the Defendants requests additional time to complete the motion.

26 On November 30, 2021, Counsel for Plaintiff and Counsel for the Defendants had an email
exchange in which the extension was agreed upon. Accordingly, the parties hereby stipulate to extend

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1 the deadline to file dispositive motions from November 30, 2021 to **January 18. 2022**. The parties
2 respectfully request the Court grant the request, and extend the deadline.

3
4 DATED this 30th day of November, 2021

5 LISA A. RASMUSSEN, ESQ.
6 Law Offices of Kristina Wildeveld & Assoc.

DATED this 30th day of November, 2021

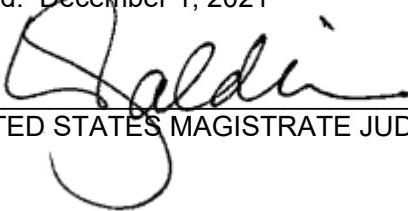
AARON D. FORD
Attorney General

7
8 By: /s/ Lisa A. Rasmussen
9 LISA A. RASMUSSEN, Bar No. 7491
10 Attorney for Plaintiff

By: /s/ Douglas R. Rands
DOUGLAS R. RANDS, Bar No. 3572
Senior Deputy Attorney General
Attorneys for Defendants

11
12 IT IS SO ORDERED.

13
14 Dated: December 1, 2021

15
16 
17 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 30th day of November, 2021, I caused to be served a copy of the foregoing, **STIPULATION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS (Second Request)**, by U.S. District Court CM/ECF Electronic Filing to:

Lisa A. Rasmussen, Esq.
The Law Offices of Kristina Wildeveld & Associates
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/s/ Roberta W. Bibee
An employee of the Office of the
Nevada Attorney General